DE/AFS/SF

KNIFE RIVER
AN MDU RESOURCES COMPANY

5450 W. Gowen Road
Boise, ID 83709
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Southern Idaho Division

October 10, 2007

Mr. Morrie Lewis
Air Quality Permit Analyst
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho, 83706-1255

Re: Facility ID No. 777-00423, Knife River, Inc., Portable
15-Day Pre-Permit Construction Approval Application
For Portable Ready Mix Plant

Dear Mr. Lewis:

We are resubmitting the 15-day Pre-Permit Construction application with a revised to scale plot plan and revised production rates to meet the 197' set back.

We are submitting this information in response to the Knife River 15-Day Pre-permit Approval application completeness denial for a concrete batch plant dated October 9, 2007. This denial is based on a revised IDEQ definition of "receptor" that was not publicly available at the time the application was submitted. Please find the attached Air Dispersion Modeling Protocol Request to use Generic Modeling Results signed by Jim Trull on 8/16/07. This request form specified that the concrete batch plant would have a capacity of 400,000 cubic yards per year and a daily production rate of 2,400 cubic yards per day. The set back requirement for the new definition of "receptor" is 197' from the roadway. These production limitations and the 197' set back are acceptable to us and will be implemented. Please provide the completeness determination upon receipt of this information.

If you have any questions please contact Mike Reese at 208-362-6152 or mike.reese@kniferiver.com.

Sincerely Yours,

Jim Trull
Operations Manager

JT:jk

AIR DISPERSION MODELING PROTOCOL : REQUEST TO USE DEQ GENERIC MODELING RESULTS TO DEMONSTRATE PRECONSTRUCTION COMPLIANCE WITH IDAHO AIR QUALITY RULES.

Proposed Project: **Portable Concrete Batch Plant**, 2,400cy/HR 400,000 cy/YR

Location: (if portable, identify initial location) _19543 Dixie River Road, Caldwell, ID

1) An emissions inventory (EI) based on the plant's capacity and proposed maximum daily and annual operations will be included with the application, and will comply with the following:

   a. Emissions will be calculated using AP-42 emission factors and good engineering judgment.
   b. Fugitive emissions sources will be included in the EI, except for emissions resulting from vehicle traffic and wind erosion from storage piles.
   c. The level of emissions control assumed for each source will be clearly specified.
   d. Cr+6 will be presumed to comprise 20% of the total chromium emissions from cement silo filling, and 30% of the total chromium emissions from cement supplement (flyash) silo filling.

2) The proposed project will meet all of the criteria specified below, and Knife River agrees to accept permit conditions requiring continuing compliance with the physical parameters and setback distance(s) described in Table 1. Knife River is requesting that the DEQ generic model results be used to demonstrate preconstruction compliance with NAAQS and TAPs for this project. No additional modeling analysis will be submitted for this project.

Table 1. CRITERIA FOR USING DEQ's CONCRETE BATCH PLANT GENERIC MODELING RESULTS FOR AIR IMPACT ANALYSES

Parameter	DEQ Generic Modeling Assumptions				Proposed Project
Concrete batch plant type and capacity	Truck mix (redi-mix or dry mix) or Central mix				Truck Mix
Operation in any PM_{10} nonattainment area	Not proposed.				Not Proposed
Presence of an electric generator.	No generator. Line power is available.				No generator, Line Power available.
No Collocation. Minimum distance from nearest edge of any emissions source to any other source of emissions, including another concrete batch plant, hot mix asphalt plant, or rock crushing plant.	200 meters (656 feet)				Meets 656 no collocation criteria
Number of cement and/or cement supplement storage silos	Not limited. The model layout assumes all silo emissions are from the same point, and that cement/supplement is not transferred between storage silos.				
Maximum daily concrete production (cy/day)	1,500	2,400	3,600	4,800	2,400
Minimum Setback Distance. Minimum distance from nearest edge of any emissions source to a receptor.[a]	40 m (131 ft)	60 m (197 ft)	100 m (328 ft)	150 m (492 ft)	197'
Maximum annual concrete production (cy/year)	300,000	400,000	500,000	500,000	400,000
Cement and supplement storage silo baghouse(s) Minimum stack height (height above ground) Minimum PM/PM_{10} control	10 meters (32.8 ft) 99%				Meets 32.8' minimum
Weigh hopper loading baghouse, or equivalent Minimum stack height (height above ground) Minimum PM/PM_{10} control	10 meters (32.8 ft) 99%				Weigh hopper baghouse is 18.5' agl. This is design std of CONECO plant
Truck-mix loadout or Central Mix loading. Minimum PM/PM_{10} control.	95% Boot enclosure, shroud, water sprays, or baghouse/cartridge filter				Enclosed with shroud
Transfer Point Fugitives. Minimum PM/PM_{10} control.	75% Water sprays, enclosures, shrouds, or aggregate/sand is damp on an as-received basis and used before significantly drying out.				Will employ water sprays, shrouds, low height drop points, damp materials as appropriate to minimize fugitives

Jim Tevill
Print Name

Signature

Knife River
Company

Operations Manager
Title/Position

362-6152
Telephone/E-mail

8-16-07
Date

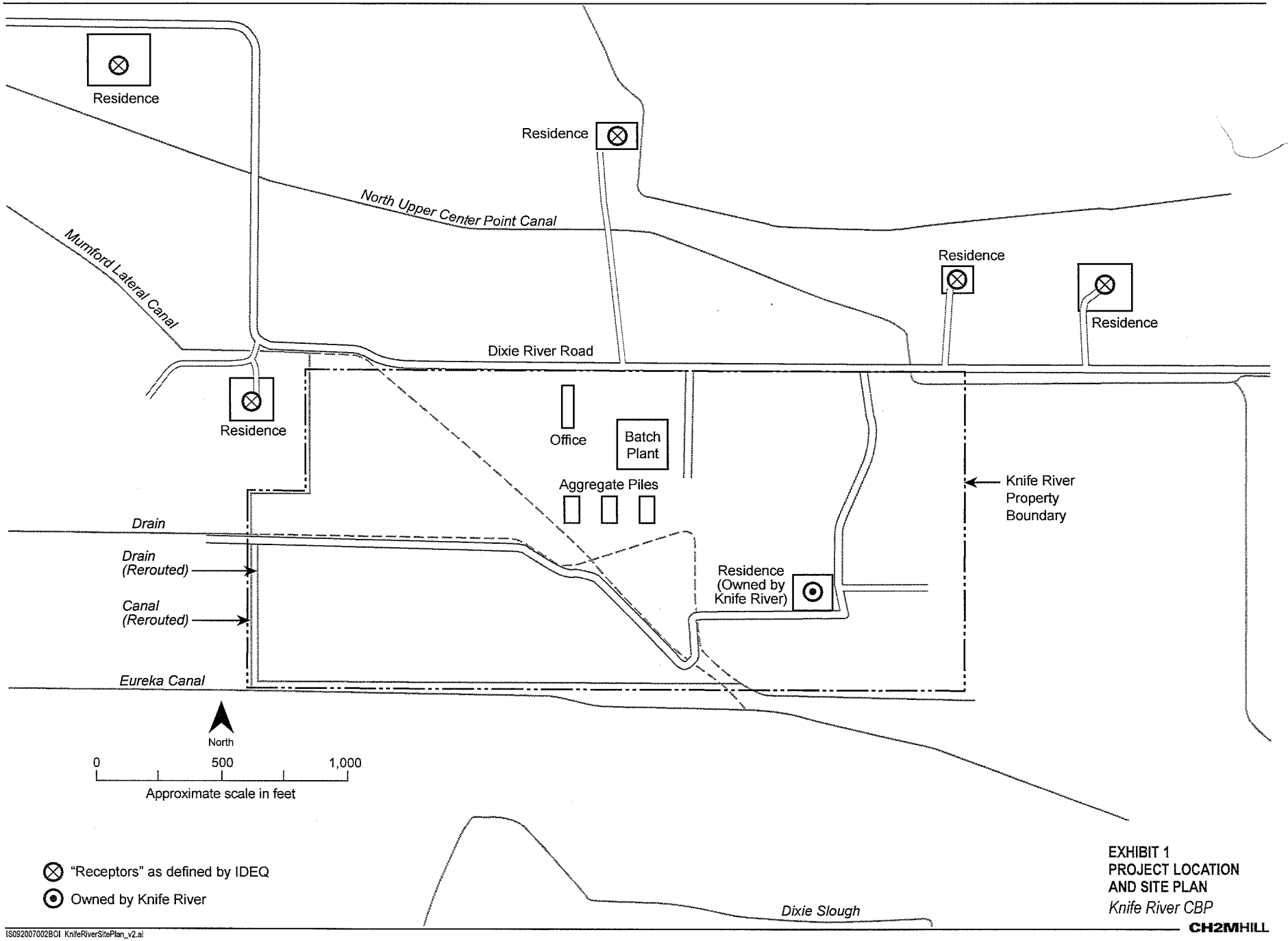

EXHIBIT 1
PROJECT LOCATION
AND SITE PLAN
Knife River CBP

IS092007002BOI KnifeRiverSitePlan_v2.ai

CH2MHILL